

EXHIBIT 6

From: [Kevin Dean](#)
To: [Turner, Joseph B. \(CIV\)](#); [Mirsky, Sara J. \(CIV\)](#); [Matthew D. Quinn](#); jeb@belllegalgroup.com; [Bain, Adam \(CIV\)](#); [Lipscomb, Bridget \(CIV\)](#); [Ryan, Patrick J. \(CIV\)](#); [James A. Roberts](#); [Zina Bash](#); [Adams, Jennifer E \(CIV\)](#)
Cc: [Brown, Emily](#); [Sarah Swett - Motley Rice](#)
Subject: Re: CLJA - Quantico Inspection Screenshots & Documents
Date: Thursday, February 1, 2024 1:28:42 PM

Joey,

I appreciate the government's hosting an inspection of the Network Attached Storage ("NAS") in Quantico on January 30, 2024. We are presently evaluating the results of that inspection and will likely be sending further correspondence in the near future. However, there is one matter that is especially pressing that must be addressed now. Specifically, the NAS did not contain the digitized muster rolls requested by the PLG. We are writing to ask the government to advise, within 5 days, where the requested digitized muster rolls are being stored.

The inspection in Quantico was conducted in response to the PLG's Corrected First Set of Requests for Production, Request No. 3. For reference, that request sought the following digitized muster rolls:

Please produce the ESI, as defined herein, and data created as a result of the digitizing of the 61 million pages of USMC Camp Lejeune Muster Rolls representing over 5 million unique Service Members who were stationed at Camp Lejeune from the 1950s to 1971 which was performed by the USMC via contract beginning in 2013 and completed by December 2015 based on the 2013, 2014, and 2015 VA/DoD Executive Committee Annual Reports.

(Please note that our quotation of the above is not intended to re-trigger any prior request for ESI.)

The government's various emails and letters clearly indicated that the NAS in Quantico contained—barring any technological issues with retrieval—the digitized muster rolls created pursuant to the above-described project. For instance, the government's letter of January 12, 2024 contained a section entitled "Request No. 3 (RFP Set No. 1)" that discussed "muster roll images located on the external Network-Attached Storage (NAS)." *See* page 2. Further, the government's email of January 23, 2024 stated that "Request 3 relates to muster rolls from the 1950s-71, which are in the possession of the Marine Corps," and further stated that "the USMC has agreed to meet with Plaintiffs in Quantico on January 30 to review the legacy system in person."

In short, the government has repeatedly indicated that the NAS in Quantico, which was inspected on January 30, 2024, contained digitized muster rolls responsive to Request No. 3—namely, digitized muster rolls for "over 5 million unique Service Members who were stationed at Camp Lejeune from the 1950s to 1971." The PLG waited patiently for several months while the government attempted to retrieve these digitized muster rolls from the NAS. Further, the PLG expended significant time and resources attending the inspection in Quantico on January 30, 2024.

The inspection in Quantico incontestably revealed that the referenced NAS does not contain the digitized muster rolls sought by Request No. 3. In fact, the Marine personnel present during the inspection and involved in the retrieval operation were flummoxed by our belief

that the NAS might store the requested digitized muster rolls. A simple conversation between the Department of Justice and the Marines involved with the NAS would have immediately disclosed that the NAS was irrelevant to the PLG's discovery requests. It is difficult to understand why this issue was not revealed months ago.

We ask that the DOJ disclose, within 5 days, the location of the digitized muster rolls sought by Request No. 5.

Sincerely,

Kevin

Kevin R. Dean
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From: Turner, Joseph B. (CIV) <Joseph.B.Turner@usdoj.gov>
Sent: Wednesday, January 31, 2024 2:13:20 PM
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Cc: Brown, Emily <ebrown@motleyrice.com>; Sarah Swett - Motley Rice <sleblanc@motleyrice.com>
Subject: CLJA - Quantico Inspection Screenshots & Documents

Counsel,

Attached are the requested screenshot copies and Excel export from the Quantico inspection/demonstration on January 30. Thank you.

Joey Turner
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